

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MARYLAND**
Baltimore Division

IN RE:

Case No.: 23-15564-MMH

ALEASHA LEWIS
Debtor

Chapter: 13

OBJECTION TO CONFIRMATION OF DEBTOR'S PROPOSED CHAPTER 13 PLAN

COMES NOW, Nationstar Mortgage LLC ("Creditor"), by and through counsel, and files its Objection to Debtor's Chapter 13 Plan, and as reasons therefor respectfully represents as follows:

1. Creditor is a mortgage lender/servicer.
2. On or about August 8, 2023, Aleasha Lewis ("Debtor") filed a Voluntary Petition in this Court under Chapter 13 of the United States Bankruptcy Code.
3. Brian A. Tucci is the Chapter 13 Trustee of the Debtor's bankruptcy estate.
4. Creditor holds a Deed of Trust solely secured by the Debtor's property located in Baltimore County, Maryland, and improved by a residence known as 2602 West Woodwell, Dundalk, MD 21222 (the "Property").
5. On or about August 8, 2023, Debtor filed a Chapter 13 Plan (the "Plan") that states that prepetition arrears owed to Creditor in the amount of \$40,398.35 will be treated through the Plan. This amount understates the actual prepetition arrears owed to the Creditor.
6. Objections to the Plan are due by October 4, 2023.
7. The deadline to file a proof of claim is October 17, 2023.
8. Creditor has not yet filed its proof of claim but anticipates filing a proof of claim that will include prepetition arrears of approximately \$46,556.17.
9. Debtor's Plan is underfunded and is therefore not confirmable.
10. Creditor does not oppose denial of the Plan with leave to amend or continuance, as proper for disposition and processing of this matter.

WHEREFORE, the Creditor its successors and/or assigns prays that this Court:

1. Enter an order DENYING confirmation of the Debtor's Chapter 13 Plan; and

2. Grant such other and further relief as necessary.

Respectfully Submitted,

Dated: August 15, 2023

/s/ Nikita Joshi
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Counsel for the Creditor

CERTIFICATE OF SERVICE

I hereby certify that on this 15th day of August, 2023, I reviewed the Court's CM/ECF system and it reports that an electronic copy of the foregoing Objection to Chapter 13 Plan will be served electronically by the Court's CM/ECF system on the following:

Brian A. Tucci, Trustee

Brian A. Cavanaugh, Esq.

I hereby further certify that on this 15th day of August, 2023, a copy of the Objection to Chapter 13 Plan was also mailed first class mail, postage prepaid, to:

Aleasha Lewis
2602 West Woodwell Road
Dundalk, MD 21222

/s/ Nikita Joshi
Nikita Joshi, Esq.